

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

KAREN MINIEX,

Plaintiff,

v.

HOUSTON HOUSING AUTHORITY,

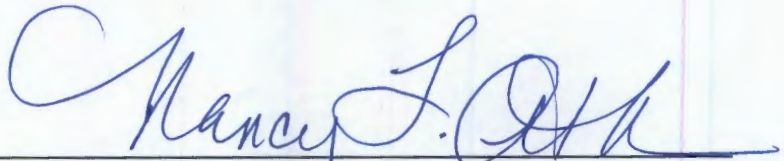
Defendant.

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CIVIL ACTION NO. 4:17-00624

**VERDICT FORM**

The following verdict form was presented to the jury on the 21<sup>st</sup> day of  
March, 2019.



NANCY F. ATLAS  
SENIOR UNITED STATES DISTRICT JUDGE

**QUESTION 1:**

Do you find by a preponderance of the evidence that Plaintiff Karen Miniex (“Miniex”) engaged in a protected activity under the False Claims Act?

*Answer “Yes” or “No.”*

Answer: yes

*If you answered “Yes” to Question 1, please answer Question 2. If you answered “No” to Question 1, then you have completed your work and you should sign at the end of this Verdict Form.*

**QUESTION 2:**

Do you find by a preponderance of the evidence that the protected activity or activities you found in connection with Question 1 was/were outside of Miniex's job duties?

*Answer "Yes" or "No."*

Answer: yes

*Please answer Question 3(A).*

**QUESTION 3(A):**

Do you find by a preponderance of the evidence that Defendant Houston Housing Authority ("HHA") took an adverse employment action against Miniex?

*Answer "Yes" or "No."*

Answer: yes

*If you answered "Yes" to Question 3(A), please answer Question 3(B). If you answered "No" to Question 3(A), then you have completed your work and you should sign at the end of this Verdict Form.*

**QUESTION 3(B):**

What, if any, adverse employment action(s) was/were the basis for your answer to Question 3(A):

1. Threats to Miniex's employment status from June 2016 to August 2016.

*Answer "Yes" or "No."*

Answer: yes

2. The "written verbal" warning to Miniex on September 8, 2016.

*Answer "Yes" or "No."*

Answer: yes

3. "Suspension" on November 29, 2016.

*Answer "Yes" or "No."*

Answer: yes

4. Termination on December 9, 2016.

*Answer "Yes" or "No."*

Answer: yes

*Please answer Question 4.*

***Answer Question 4 as to adverse employment action(s) to which you answered "Yes" in Question 3(B).***

**QUESTION 4:**

Do you find by a preponderance of the evidence that HHA took that adverse employment action against Miniex because she engaged in a protected activity?

***Answer "Yes" or "No."***

Answer: yes

***If you answered "Yes" to Question 4, please answer Question 5. If you answer "No" to Question 4, then you have completed your work and you should sign at the end of this Verdict Form.***



**QUESTION 5:**

What sum of money, if paid now in cash, do you find by a preponderance of the evidence would fairly and reasonably compensate Miniex for the damages, if any, you have found HHA caused Miniex?

Answer in dollars and cents, if any, for the following items and none other:

1. Back Pay:

\$ 370,571

2. Front Pay:

\$ 600,000

3. Past pain and suffering, inconvenience, mental anguish, or loss of enjoyment in life:

\$ 317,750

4. Future pain and suffering, inconvenience, mental anguish, or loss of enjoyment in life:

\$ 215,000

***Please answer Question 6.***

**QUESTION 6:**

Do you find by a preponderance of the evidence that Miniex failed to reduce her damages through the exercise of reasonable diligence in seeking, obtaining, and maintaining substantially equivalent employment after the date of her termination from HHA?

*Answer "Yes" or "No."*

Answer: NO

*If you answered "Yes" to Question 6, please answer Question 7. If you answered "No" to Question 6, then you have completed your work and you should sign at the end of this Verdict Form.*



**QUESTION 7:**

How much do you find by a preponderance of the evidence Miniex would have earned had she exercised reasonable diligence under the circumstances to minimize her damages?

Answer in dollars and cents, if any.

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